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14	UNITED STATES	DISTRICT COURT
15	NORTHERN DISTRI	CT OF CALIFORNIA
16		
17 18 19	IN RE: SOCIAL MEDIA ADOLESCENT ADDICTION/PERSONAL INJURY PRODUCTS LIABILITY LITIGATION	MDL No. 3047  CASE NO.: 4:22-md-03047-YGR  Honorable Thomas S. Hixson
20	This Filing Relates to:	STIPULATED REQUEST FOR ORDER CHANGING TIME (ESI
21	ALL ACTIONS	PROTOCOL)
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STIPULATED REQUEST FOR ORDER CHANGING TIME

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Pursuant to Civil Local Rules 6-1(b) and 6-2, the parties, through their undersigned counsel, hereby stipulate and respectfully request that the Court extend the deadline to file a proposed ESI Protocol or letter briefing on disputes regarding that order to June 9, 2023. The parties declare in support of this request:

- 1. Pursuant to Case Management Order No. 5 (Dkt. 164), the parties are currently negotiating a proposed ESI Protocol;
- 2. The parties previously stipulated to extend the deadline to file a proposed ESI Protocol or letter briefing on disputes regarding that order from April 14, 2023, to April 28, 2023;
- The parties have been working diligently to eliminate or narrow disputes over a proposed ESI Protocol, including by exchanging drafts and through a series of meet-and-confers;
  - 4. Given the other issues the parties are also working to resolve, including those related to the preservation order (*see* Dkt. 245), the parties believe they would benefit from more time to continue their conferrals and attempt to narrow the disputes regarding the ESI Protocol they ask the Court to resolve;
- 5. Extending this deadline will not affect any other deadline affixed by the Court.

THEREFORE, pursuant to Local Rules 6-1(b) and 6-2, the parties stipulate and respectfully request that the Court extend the deadline to submit a joint proposed ESI Protocol or letter briefing regarding disputes over that order to June 9, 2023.

## IT IS SO STIPULATED AND AGREED.

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Dated: April 28, 2023 Respectfully submitted,

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CHRISTOPHER A. SEEGER
CHRISTOPHER L. AYERS
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55 CHALLENGER ROAD, 6<sup>TH</sup> FLOOR RIDGEFIELD PARK, NJ 07660

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CASE No.: 4:22-MD-03047-YGR

1	ATTESTATION
2	I, Christopher A. Seeger, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the
3	concurrence to the filing of this document has been obtained from each signatory thereto.
4	Dated: April 28, 2023  /s/ Christopher A. Seeger Christopher A. Seeger
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